

Ex. 24

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JARI MCPHERSON,)	
JERALD SAMS, and)	
DANIEL MARTINEZ,)	
Plaintiffs,)	
)	
vs.)	CASE NO. 1:20-CV-01223-DAE
)	
TEXAS DEPARTMENT)	
OF PUBLIC SAFETY,)	
Defendant.)	

ORAL DEPOSITION

LOUIS SANCHEZ

FEBRUARY 1, 2023

(TAKEN REMOTELY)

ORAL DEPOSITION OF LOUIS SANCHEZ, produced as a witness at the instance of the Plaintiffs and duly sworn, was taken in the above-styled and numbered cause on the 1st day of February, 2023, from 2:12 p.m. to 4:15 p.m., before Dana Richardson, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine, the witness located in Flower Mound, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

1 it -- is it doesn't help by just not bringing it to
2 light, meaning that letting people know in the
3 department that this has occurred and -- and we took
4 it -- they don't know what the department's doing. They
5 don't know that we are taking action against folks like
6 that and we are getting rid of them.

7 **Q. So, then, the -- the department is not making**
8 **any public pronouncements of its opposition against**
9 **discriminatory practices. Would that be fair to say?**

10 **A. You would be correct.**

11 **Q. Okay. And in doing so, it tends to nurture and**
12 **tolerate that kind of culture and conduct. Would that**
13 **be fair to say?**

14 **A. I think you'd be correct.**

15 **Q. And you're not necessarily aware of all of the**
16 **individuals that may be discriminating and retaliating**
17 **against persons of color within the department, correct?**

18 **A. No, sir, I am not.**

19 **Q. And do you have any -- any knowledge of -- do**
20 **you know -- and hold on just a minute -- do you know**
21 **Mark Koenig?**

22 **A. No, sir. I don't know him. I've heard of him,**
23 **but -- in the department, but I don't know any knowledge**
24 **on Mark Koenig.**

25 **Q. Okay. What have you heard of him?**

1 of Deputy Inspector General, I would have investigated
2 it as an 1825 complaint.

3 Q. I see.

4 MR. MUNGO: Okay. I think that may be all
5 that I have. If you can give me just about 3 minutes,
6 about 3 or 4 minutes, I'll be right back.

7 THE WITNESS: Yes, sir.

8 MR. HARRIS: All right.

9 (Recess taken)

10 MR. MUNGO: Mr. Sanchez, thank you so much
11 for your patience.

12 Thank you, Mr. Harris, as well, and the
13 court reporter. I've just got a couple more questions
14 and then we're done and we'll pass the witness.

15 Q. (BY MR. MUNGO) Mr. Sanchez, do you know Ron
16 Joy?

17 A. I do.

18 Q. Okay. Do you have any information or any
19 experience with Mr. Joy that would in any way be related
20 to Ron Joy, either in any way engaging in any conduct
21 that would be considered even suspicious with regard to
22 a racial -- racial animus toward African Americans?

23 MR. HARRIS: Object to the form of the
24 question.

25 You may answer.

1 A. I've personally not witnessed him -- the -- I
2 have not personally witnessed him be discriminative
3 or -- or use racism. However, I know there was a lot of
4 allegations from other people. But I have never saw --
5 saw them personally.

6 Q. (BY MR. MUNGO) Okay. But -- and what kind of
7 allegations from other people of a racial nature against
8 Ron Joy?

9 A. They felt as he treated minorities,
10 specifically black males, differently. And that come
11 through the -- from Rhonda Fleming.

12 Q. Okay. Okay. And Rhonda Fleming's -- who is
13 the director -- or who is the Inspector General,
14 communicated that to you?

15 A. Yes. Because there was several people that had
16 maybe mentioned it to her or -- but I don't think there
17 was anything formal in a written allegation or
18 communication but just mentioning it.

19 Q. Okay. Okay. Did you know that Jerald Sams was
20 in his chain of command?

21 A. No, sir, I didn't know the direct chain of
22 command of Jerald Sams.

23 Q. Okay.

24 A. Well, I would imagine if he's in the Highway
25 Patrol, he -- he would have been because he's the chief.

1 So he would be in charge of all Highway Patrol
2 personnel.

3 Q. Yes. Yes. Okay. What about -- what kind
4 of -- were there any specifics regarding allegations
5 against Ron Joy with regard to racial animus toward
6 minorities, any specifics you have?

7 A. You know --

8 Q. That you can recall.

9 A. So we would discuss things every Monday
10 morning. We would discuss -- have a Monday morning
11 meeting and hours and hours of what we're hearing or
12 what -- what's being out there or -- or what we need to
13 look for. And I can't tell you the exact specifics on
14 it. I really can't. I -- because I -- I don't recall
15 the specifics.

16 Q. Okay. Not a problem. What about Jeremiah
17 Richards? Same question.

18 A. I've dealt with Jeremiah Richards on
19 investigations where we investigated, but I have not
20 personally witnessed or investigated him for anything
21 racial.

22 Q. Okay. Do you recall an investigation Jeremiah
23 Richards pertaining to a promotion board that involved
24 Jerald Sams?

25 A. No, sir, because I believe that came after I

<p>62</p> <p>1 of Deputy Inspector General, I would have investigated 2 it as an 1825 complaint. 3 Q. I see. 4 MR. MUNGO: Okay. I think that may be all 5 that I have. If you can give me just about 3 minutes, 6 about 3 or 4 minutes, I'll be right back. 7 THE WITNESS: Yes, sir. 8 MR. HARRIS: All right. 9 (Recess taken) 10 MR. MUNGO: Mr. Sanchez, thank you so much 11 for your patience. 12 Thank you, Mr. Harris, as well, and the 13 court reporter. I've just got a couple more questions 14 and then we're done and we'll pass the witness. 15 Q. (BY MR. MUNGO) Mr. Sanchez, do you know Ron 16 Joy? 17 A. I do. 18 Q. Okay. Do you have any information or any 19 experience with Mr. Joy that would in any way be related 20 to Ron Joy, either in any way engaging in any conduct 21 that would be considered even suspicious with regard to 22 a racial -- racial animus toward African Americans? 23 MR. HARRIS: Object to the form of the 24 question. 25 You may answer.</p>	<p>64</p> <p>1 So he would be in charge of all Highway Patrol 2 personnel. 3 Q. Yes. Yes. Okay. What about -- what kind 4 of -- were there any specifics regarding allegations 5 against Ron Joy with regard to racial animus toward 6 minorities, any specifics you have? 7 A. You know -- 8 Q. That you can recall. 9 A. So we would discuss things every Monday 10 morning. We would discuss -- have a Monday morning 11 meeting and hours and hours of what we're hearing or 12 what -- what's being out there or -- or what we need to 13 look for. And I can't tell you the exact specifics on 14 it. I really can't. I -- because I -- I don't recall 15 the specifics. 16 Q. Okay. Not a problem. What about Jeremiah 17 Richards? Same question. 18 A. I've dealt with Jeremiah Richards on 19 investigations where we investigated, but I have not 20 personally witnessed or investigated him for anything 21 racial. 22 Q. Okay. Do you recall an investigation Jeremiah 23 Richards pertaining to a promotion board that involved 24 Jerald Sams? 25 A. No, sir, because I believe that came after I</p>
<p>63</p> <p>1 A. I've personally not witnessed him -- the -- I 2 have not personally witnessed him be discriminative 3 or -- or use racism. However, I know there was a lot of 4 allegations from other people. But I have never saw -- 5 saw them personally. 6 Q. (BY MR. MUNGO) Okay. But -- and what kind of 7 allegations from other people of a racial nature against 8 Ron Joy? 9 A. They felt as he treated minorities, 10 specifically black males, differently. And that come 11 through the -- from Rhonda Fleming. 12 Q. Okay. Okay. And Rhonda Fleming's -- who is 13 the director -- or who is the Inspector General, 14 communicated that to you? 15 A. Yes. Because there was several people that had 16 maybe mentioned it to her or -- but I don't think there 17 was anything formal in a written allegation or 18 communication but just mentioning it. 19 Q. Okay. Okay. Did you know that Jerald Sams was 20 in his chain of command? 21 A. No, sir, I didn't know the direct chain of 22 command of Jerald Sams. 23 Q. Okay. 24 A. Well, I would imagine if he's in the Highway 25 Patrol, he -- he would have been because he's the chief.</p>	<p>65</p> <p>1 was there. 2 Q. Got it. Okay. Very good. Very good. 3 MR. MUNGO: Okay. Those are all the 4 questions that I have. Hold on one second. I don't 5 believe I have anything else. One moment. 6 Okay. All right. That's it. I don't 7 have anything further. I pass the witness, Mr. Harris. 8 MR. HARRIS: All right. We'll reserve our 9 questions for trial and ask that the witness be given an 10 opportunity to review and sign the transcript. 11 THE REPORTER: We are concluded at 12 4:15 p.m. 13 (Deposition concluded at 4:15 p.m.) 14 15 16 17 18 19 20 21 22 23 24 25</p>

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CHANGES AND SIGNATURE

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STATE OF TEXAS
COUNTY OF MONTGOMERY

REPORTER'S CERTIFICATE

I, Dana Richardson, a Certified Shorthand Reporter

in and for the State of Texas, do certify that this

deposition transcript is a true record of the testimony

given by the witness named herein, after said witness

was duly sworn by me. The witness was requested to

review the deposition

I further certify that I am neither attorney or

counsel for, related to, nor employed by any parties to

the action in which this testimony is taken and,

further, that I am not a relative or employee of any

counsel employed by the parties hereto or financially

interested in the action.

I further certify that the amount of time used by

each party at the deposition is as follows:

Mr. Leonard Mungo - 01:41

SUBSCRIBED AND SWORN TO under my hand and seal of

office on this the 15th day of February, 2023

Dana Richardson, RPR, TX CSR 5386

Expiration: 01/31/24

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8 I declare under penalty of perjury that the
9 foregoing is true and correct.

LOUIS SANCHEZ

15 SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned
16 authority, by the witness, LOUIS SANCHEZ, on this the
17 ____ day of _____, ____.

NOTARY PUBLIC IN AND FOR
THE STATE OF _____

My Commission Expires: _____